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Via ECF

The Honorable Judge Analisa Torres
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Ramos-Ramirez v. Alex Auto Parts Inc., et al.**
20-CV-5079 (AT)

Dear Judge Torres:

We represent the Plaintiff in the above-referenced matter and we submit this letter motion jointly with Defendants to provide the Court with a status update and to request additional time to file the parties' settlement submissions pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) and the Court's April 5, 2021 Order.

On March 30, 2021, the parties submitted a status report advising that they had re-engaged in settlement discussions among themselves and believed that they were close to reaching an agreement to resolve the claims asserted herein. Following the filing of the status report, the Court set a May 5, 2021 deadline for the *Cheeks* submission. Unfortunately, at that time, the parties were still negotiating and did not have an agreement prepared for submission. However, as of today, the parties can report that they have reached a settlement-in-principle as to Plaintiff's claims.

As the parties have agreed on the terms of the settlement as of today, we respectfully request a three-week extension of the May 5, 2021 deadline for the parties' *Cheeks* submission. If this request is granted, the parties can file on or before May 26, 2021.


This is the first request for an extension of time to file the settlement submissions and this request will not affect any other scheduled dates or deadlines.

We thank Your Honor for her consideration on this matter and remain available to provide any additional information.

GRANTED.

SO ORDERED.

Dated: May 17, 2021
New York, New York



ANALISA TORRES
United States District Judge